

FEB 05 1982

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Ralph L. Hoffman  
Registered Agent for Service  
42141 Sarpy  
St. Louis, Missouri 63110

Dear Mr. Hoffman:

On August 13, 1981, an inspection of Perfection Manufacturing Company (Perfection) was conducted by the United States Environmental Protection Agency (EPA), Region VII, under the authority of §3007 of the Resource Conservation and Recovery Act (RCRA). Based on this investigation, Perfection Manufacturing Company has been determined to be in violation of several provisions of RCRA. This letter concerns violations in addition to those addressed in the Compliance Order issued to Perfection on the same date as this letter. Further enforcement action will be taken unless all violations addressed in this letter are remedied in the time periods indicated below.

The additional violations of RCRA regulations by Perfection determined during the inspection and the schedule for compliance with the appropriate regulations are as follows:

1. Pursuant to 40 C.F.R. §262.34(a)(5) and 40 C.F.R. §265.16, a facility handling hazardous waste must design a training program for facility personnel and the program must be directed by a person trained in hazardous waste management procedures; and further training records on current personnel must be kept until closure of the facility. At the time of the inspection, the personnel training plan for the facility had not been prepared. Within thirty (30) days of receipt of this letter, Perfection shall prepare a personnel training plan in accordance with 40 C.F.R. §265.16.

2. Pursuant to 40 C.F.R. §262.34(a)(5) and 40 C.F.R. §265.37, the owner or operator of a facility must attempt to make arrangements with local authorities to familiarize them with the characteristics of the facility. At the time of the inspection, the arrangements with local authorities had not been made. Within thirty (30) days, Perfection shall make arrangements with local authorities as required by 40 C.F.R. §265.37.

R00406749  
RCRA RECORDS CENTER

CONCURRENCES							
SYMBOL	LEGL	LEGL	LEGL	CNSL	RGAD		
SURNAME	MICINSKI	SHIEC		Mon	JTV		
DATE	1/21/82	1/21/82	1/ /82	2/1/82	2/2/82		

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3. Pursuant to 40 C.F.R. §265, Subpart D, the owner or operator of a hazardous waste facility must propose and implement a contingency plan for his facility. On the date of the inspection, the contingency plan had not been prepared. Within thirty (30) days, Perfection shall prepare a facility contingency plan as required by 40 C.F.R. §265, Subpart D.

You are further advised that under the terms of the Compliance Order, Perfection will no longer be permitted to operate as a Treatment, Storage or Disposal facility. Accordingly, Perfection must properly dispose of all hazardous waste as required by 40 C.F.R. Part 262, Standards for Generators of Hazardous Waste. Perfection is advised to particularly note the requirements in 40 C.F.R. §262.34.

In your letter of March 24, 1981, you stated that Perfection was a small quantity generator of hazardous waste. At the time of the inspection, there were nine 55-gallon barrels of waste paint sludge being stored at the facility. The dates on these barrels indicated that accumulation began on either July 31, 1981, or August 3, 1981. This fact indicates that Perfection had generated more than 1,000 kilograms of this material in a calendar month. 40 C.F.R. §261.5, Special Requirements for Hazardous Waste Generated by Small Quantity Generators, states that a generator is a small quantity generator in a calendar month if he generates less than 1,000 kilograms of hazardous waste in that month. Therefore, Perfection was not a small quantity generator during that time and was subject to the standards set forth for generators as previously described.

If you have any questions on this matter, please contact Cheryle Micinski, Attorney, Legal Enforcement Staff, Office of Regional Counsel, at the United States Environmental Protection Agency, Region VII, 324 East 11th Street, Kansas City, Missouri 64106, telephone number - (816) 374-7142.

Sincerely yours,

John J. Franke, Jr.  
Regional Administrator  
Environmental Protection Agency  
Region VII

CNSL/LEGL/CLMicinski:ksh:1-21-82:Doc.3276A



PS Form 3811, Jan. 1979

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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2. ARTICLE ADDRESSED TO: Mr. Ward A. Buck, Jr., VP-Manf. Perfection Manf. Co., 5411 Bulwer Ave St. Louis, MO 63147		
3. ARTICLE DESCRIPTION:		
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